



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

TO: Richard P. Keigwin, Jr., Director
Office of Pesticide Programs

FROM: Michael L. Goodis, Director *Michael Goodis* May 4, 2020
Registration Division
Office of Pesticide Programs

SUBJECT: Recertification: Section 18 Specific Emergency Exemption for the Use of Clothianidin on Immature Citrus Trees to Control Huanglongbing Disease Vectored by Asian Citrus Psyllid in Texas (20TX03)

This is the seventh year overall that EPA has received a specific emergency exemption request for the use of clothianidin on immature citrus trees to control the transmission of Huanglongbing disease (HLB) vectored by the Asian Citrus Psyllid (ACP), and the fourth year that the Texas Department of Agriculture (TDA) has requested the use of clothianidin on young citrus trees in commercial groves. In a letter dated April 14, 2020, TDA recertified that the conditions of the emergency persist and there continues to be an urgent need for this use since Texas citrus producers continue to struggle with the management and severity of this invasive disease and vector complex. **For more details on the emergency and EPA assessments, the September 12, 2014 memorandum is attached.**

The proposed use pattern requested this year is identical to the authorization letter issued to the TDA on May 7, 2019, including the use rates and type of application. A maximum of 4,000 acres may be treated under this exemption program. In the 2019 final use report, TDA reported that approximately 608 acres of young citrus trees were treated for management of psyllids. There were no adverse effects reported resulting from this emergency exemption program in Texas.

BEAD reviewed the TDA application in 2016 and determined that there were no effective alternative pesticides available for season-long protection of 3 to 5-year-old (immature) citrus trees. Both HLB, also known as citrus greening disease, and its vector (ACP) are invasive pests. HLB is considered the most serious disease of citrus worldwide. BEAD concluded that an urgent and non-routine situation exists and that Texas citrus growers are likely to experience significant economic losses due to ACP transmission of HLB. The 2016 HED and EFED assessments also support the current request because the use pattern is the same as previously requested.

The registrant, Valent U.S.A., LLC, supports the section 18 request for this use and expects IR-4 to submit the tolerance petition in the future to support a section 3 registration upon completion of the clothianidin registration review process. The comment period for the registration review proposed interim decision for neonicotinoid pesticides, which includes clothianidin, closes on May 4, 2020.

Therefore, I recommend that the attached section 18 action be approved. In the event, that this emergency use is requested next year, RD is making a preliminary determination that this use is eligible for a streamlined application under the recertification program.